

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
v.	:	No. 17 Cr. 357 (LAK)
	:	
DAVID BLASZCZAK,	:	
THEODORE HUBER,	:	
ROBERT OLAN, and	:	
CHRISTOPHER WORRALL,	:	
	:	
Defendants.	:	
-----X	:	

**NOTICE OF MOTION *IN LIMINE***  
**TO ENFORCE PROFFER AGREEMENT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Defendant Christopher Worrall, by and through his counsel, will move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and date to be set by the Court for an order enforcing the terms of his proffer agreement, establishing a protocol concerning the admission of any proffered statement, and for such other relief as this Court may deem just and proper.

Dated: New York, New York

March 21, 2018

Respectfully submitted,

SHEARMAN & STERLING LLP

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